



DISTRICT COURT OF MARYLAND FOR

LOCATED AT (COURT ALICESS)

CASE NO.

CV

PARTIES

Plaintiff **ABDOULAYE SENE**
 10010 VANDERBILT CIRCLE
 #11
 ROCKVILLE, MD 20850

VS.

Defendant(s): **EXPERIAN**
 1. P.O. BOX 4500, ALLEN, TX 75013
 RESIDENT AGENT: THE CORPORATION TRUST
 INCORPORATED
 351 WEST CAMDEN STREET
 BALTIMORE, MD 21201

Serve by:
☒ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

Serve by:
☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

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☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

Serve by:
☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

ATTORNEYS

For Plaintiff - Name, Address, Telephone Number & Code

COMPLAINT, APPLICATION AND AFFIDAVIT
IN SUPPORT OF JUDGMENT
☒ \$5,000 or under ☐ over \$5,000 ☐ over \$10,000

Clerk: Please docket this case in an action of ☐ contract ☒ tort
☐ replevin ☐ detinue ☐ bad faith insurance claim

The particulars of this case are:

OVER THE COURSE OF 2016, I HAVE SENT 5 DIFFERENT
 LETTERS, ALL REGISTERED AND SENT VIA USPS
 CERTIFIED MAIL WITH TRACKING NUMBERS, ASKING
 THE DEFENDANT TO VERIFY 2 ACCOUNTS THAT THE
 DEFENDANT HAS LISTED ON MY CONSUMER REPORT.

ACCORDING TO THE FAIR CREDIT REPORT ACT
 (FCRA) SECTION 609 (a) (1) (A) and SECTION
 611 (a) (1) (A), THE DEFENDANT IS REQUIRED TO
 PROVIDE ME, UPON MY REQUEST, ANY ORIGINAL
 DOCUMENTATION, THAT WOULD PROVE THAT THE
 ACCOUNTS ARE INDEED ACCURATE, COMPLETE
 AND TRUE, WHILE THE DEFENDANT HAS

(See Continuation Sheet)

The Plaintiff claims \$ 5000, plus interest of \$ _____,
 Interest at the ☐ legal rate ☐ contractual rate calculated at _____
 %, from _____ to _____ (_____ days x \$ _____
 per day) and attorney's fees of \$ _____ plus court costs.

☐ Return of the property and damages of \$ _____
 for its detention in an action of replevin.
☐ Return of the property, or its value, plus damages of
 \$ _____ for its detention in action of detinue.
☐ Other: _____
 and demands judgment for relief.

Signature of Plaintiff/Attorney/Attorney Code

Printed Name: **ABDOULAYE SENE**
 Address: **10010 VANDERBILT CIRCLE, #11, ROCKVILLE, MD 20850**
 Telephone Number: **202 573 2022**
 Fax: _____
 E-mail: _____

MILITARY SERVICE AFFIDAVIT

☐ Defendant(s) _____ is/are in the military service.
☒ No Defendant is in the military service. The facts supporting this statement are: **THIS IS A COMPANY**

Specific facts must be given for the Court to conclude that each Defendant who is a natural person is not in the military

☐ I am unable to determine whether or not any Defendant is in military service.

I hereby declare or affirm under the penalties of perjury that the facts and matters set forth in the foregoing Affidavit are true and correct to
 the best of my knowledge, information, and belief.

12/13/2016
 Date

Signature of Affiant

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGMENT (See Plaintiff Notice on Back Page)

Attached hereto are the indicated documents which contain sufficient detail as to liability and damage to apprise the Defendant clearly of the
 claim against the Defendant, including the amount of any interest claimed.

☐ Properly authenticated copy of any note, security agreement upon which claim is based ☐ Itemized statement of account ☐ Interest worksheet
☐ Vouchers ☐ Check ☐ Other written document ☐ Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the ☐ Plaintiff ☐ _____ of the Plaintiff herein and am competent to testify to
 the matters stated in this complaint, which are made on my personal knowledge; that there is justly due and owing by the Defendant to the
 Plaintiff the sum set forth in the Complaint.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am
 competent to testify to these matters.

Signature of Affiant

CONTINUATION SHEET

NOT PROVIDED~~ED~~ DESPITE MY MULTIPLE REQUESTS. THE DEFENDANT HAS, DESPITE MY MULTIPLE REQUESTS, FAILED TO PROVIDE THE METHOD OF VERIFICATION AS REQUIRED UNDER FCRA SECTION 611(a)(7), AND HAS JUST SENT ME LETTERS STATING THAT THE INFORMATION WAS "JUST VERIFIED AND ACCURATE".

FURTHERMORE, UNDER FCRA SECTION 611(5)(A) THE DEFENDANT IS REQUIRED TO "... PROMPTLY DELETE ALL INFORMATION WHICH CANNOT BE VERIFIED", WHICH THE DEFENDANT HAS NOT DONE THUS FAR.

THE LAW IS VERY CLEAR AS TO THE CIVIL LIABILITY AND THE REMEDY AVAILABLE TO ME UNDER SECTION 616 AND SECTION 617 SINCE THE DEFENDANT HAS NOT COMPLIED WITH FEDERAL LAW.

I AM THEREFORE ASKING FOR \$1000 FOR EACH OF THE ACCOUNTS THAT WERE NOT PROPERLY VERIFIED AND DELETED FROM MY CONSUMER REPORT FOR WILLFUL NONCOMPLIANCE, NEGLIGENT NONCOMPLIANCE UNDER THE FAIR CREDIT REPORTING ACT, DEFAMATION AND NEGLECTFUL ENABLING OF IDENTITY FRAUD. SUBTOTAL: \$ 2,000.

I AM ALSO ASKING FOR \$ 3000 IN ~~NECESSARY~~ PUNITIVE DAMAGES BECAUSE THE DEFENDANT ACTIONS HAVE CAUSED ME EXTREME STRESS FOR HAVING BEEN DENIED CREDIT CARDS, CONSUMER LOAN INCLUDING MORTGAGES AND HAS LED ME TO PAY THOUSANDS OF DOLLARS IN FEES BECAUSE OF HIGHER ~~THE~~ INTEREST RATES ON LOANS AND HUNDREDS OF DOLLARS IN CAR INSURANCE POLICIES AS A DIRECT RESULT OF THESE 2 ACCOUNTS REPORTED ON MY CONSUMER REPORT.

CONTINUATION SHEET

BY THE DEFENDANT, SUBTOTAL \$3,000

TOTAL \$5,000

A handwritten signature in black ink, appearing to be "J. J. [unclear]", is written over the "TOTAL \$5,000" text and extends into the lines below.